

BellSouth Florida OSS Testing Evaluation

Date: August 21, 2001

EXCEPTION REPORT

An exception has been identified as a result of the test activities associated with the Metrics Data Integrity Verification and Validation Review (PMR-4). This exception was originally issued as Observation 6.

Exception:

BellSouth does not properly construct the processed data used to validate certain Ordering Service Quality Measurements (Ordering: FOC timeliness {non-trunks} and Reject Interval). (PMR4)

Background:

Service Quality Measurements (SQMs) are calculated to illustrate BellSouth's Operational Support System performance. Each month, as mandated by the Florida Public Service Commission, BellSouth publishes performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the State of Florida. BellSouth also publishes the monthly processed data¹ (PMAP raw data²) used to create these reports.³

Issue:

As part of the BellSouth-Florida OSS Evaluation, KPMG Consulting validated the SQM reports, including the creation of processed data. KPMG Consulting inspected the processed data for 2 Ordering SQMs and found that the fields for reject duration and FOC duration were not calculated properly for non-mechanized orders with weekend activity. The following table identifies the CLEC Aggregate SQM reports and PMAP Raw Data tables (May 2000) affected:

1	Ordering: FOC Timeliness	Ordering: FOC Timeliness	foc_duration
-	(Non-Trunks)		_

¹ The term "processed data" refers to the data used to validate SQM calculations. For certain SQMs, BellSouth uses the term "PMAP raw data".

² The PMAP Raw Data User Manual includes instructions to calculate SQM values for certain reports. BellSouth publishes the Manual and corresponding processed data to provide to CLECs the ability to calculate their SQM values independently and thus verify the reports. The Manual is posted and updated on the PMAP site. KPMG relied on the May 15, 2000 version of the Manual.

³ These reports and PMAP raw data may be delivered in hard copy or via the PMAP Web site.



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2	Ordering: Reject Interval	Ordering: Reject Interval & Percent Reject by Interval	rej_duration

BellSouth calculates the FOC duration as the time elapsed between (1) BellSouth receipt of a service request⁴ and (2) the issuance of an FOC. BellSouth calculates for the reject duration (rej_duration) as the time elapsed between (1) BellSouth receipt of a service request and (2) the time the service request is rejected.

If a non-mechanized order is received during normal business hours and then FOC'd or rejected outside normal business hours during the weekend, BellSouth subtracted a fixed duration (33) hours from the calculation of the FOC duration and reject duration. This calculation introduces a downward bias by only including part of the weekend.⁵

KPMG Consulting re-tested using the October 2000 processed data and reports provided by BellSouth in the Amended Response to Observation 6.6 KPMG Consulting found that the fields for reject duration and FOC duration were not calculated properly for non-mechanized orders. KPMG Consulting will provide files containing the records with discrepancies to BellSouth for evaluation.⁷

KPMG Consulting examined the PMAP Raw Data tables and calculated its own values for the Reject and FOC durations using as inputs: (1) the start and end times for processing a service order (PMAP Raw Data Fields); and (2) the business rules and exclusions identified in the Raw Data Users Manual (including the exclusions to account for weekend processing of service orders).

BellSouth provided KPMG Consulting⁸ specific examples for calculating the Ordering: FOC Timeliness and Ordering: Reject Interval metric. KPMG Consulting applied the clarifications found in these examples and found discrepancies within FOC Timeliness and Reject Interval. BellSouth's documented exclusions governing the calculations of FOC Timeliness and Reject Interval do not agree with KPMG Consulting's calculations for PON's last_received on a weekend.

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⁴ BellSouth considers the date the service request was last received.

⁵ Transactions involving weekend activity are affected by the introduction of downward bias to the reject or FOC duration calculation.

⁶ BellSouth's Amended Response to Observation 6 was received October 31, 2000.

⁷ These files are proprietary and have been provided to BellSouth and the Florida Public Service Commission under separate cover.

⁸ BellSouth forwarded examples of SQM rules on March 7, 2001.



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BellSouth's third Amended Response to Observation 69 detailed additional clarifications, exclusions, and a change to PMAP calculations. KPMG Consulting will be requesting March 2001 data for retest of Ordering: FOC Timeliness and Reject Interval metrics.

1	Ordering: FOC Timeliness (Non- Trunks)	Ordering: FOC Timeliness	foc_duration	last_revd, FOC_date	
2	Ordering: Reject Interval	Ordering: Reject Interval & Percent Reject by Interval	rej_duration	first_revd, first_inclr	

Amendment – KPMG Consulting reviewed BellSouth's initial response¹⁰ and red-line SQM in addition to the amended response¹¹ and amended red-line SQM for Exception 36. A retest was conducted based on March 2001 data. KPMG Consulting applied BellSouth's exclusions as outlined in the red-line SQM, but found discrepancies within the "Ordering: Firm Order Confirmation Timeliness" and "Ordering: Reject Interval" SQMs. The discrepancies are summarized below.¹²

Firm Order Confirmation Timeliness - Partially Mechanized - Non-Residential¹³

1 2/12/01 9:19:	10 3/1/01 15:23:15	136.07	.01

Firm Order Confirmation Timeliness - Non-Mechanized - Non-Residential

1	3/2/01 9:43	3/2/01 9:36	-0.12	.02
2	3/7/01 11:17	3/7/01 11:08	-0.15	.02
3	3/1/01 16:12	3/1/01 15:41	-0.52	.02

⁹ BellSouth's 3rd Amended Response to Observation 6, March 13, 2001.

¹⁰ Florida OSS BellSouth's Response to Exception 36, 5/16/01.

¹¹ Florida OSS BellSouth's Amended Response to Exception 36, 6/11/01.

¹² The transactions are proprietary and will be provided to BellSouth and the Florida Public Service Commission separately.

¹³ Non-Residential transactions include Business, Complex, and UNE transactions.

¹⁴ Durations are calculated in hours.



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Fir	m Order Confirmation	Timelines	s - Non-Mechanized - Re	esidential
1	3/20/01 16:59 3/20/0	1 16:53	-0.10	.02

Reject Interval - Partially Mechanized - Non-Residential

		mir, Michanizeu		
1_	3/12/01 12:07:12	3/12/01 12:08:10	.02	59.25
2_	3/7/01 11:14:44	3/7/01 11:18:32	.06	20.18
3	3/15/01 9:55:52	3/19/01 12:50:20	22.91	.02
4	3/13/01 8:31:54	3/14/01 9:13:41	10.70	.04
5	3/13/01 9:02:41	3/14/01 9:21:55	10.32	.03
6	3/19/01 6:49:41	3/20/01 11:54:37	13.91	.02
7	3/19/01 6:59:52	3/19/01 7:02:25	.02	14.15
8	3/6/01 11:35:59	3/6/01 16:01:42	4.43	.02
9	3/19/01 15:53:08	3/19/01 15:54:46	.03	22.11
10	3/23/01 9:51:52	3/23/01 9:53:48	.03	14.9
11	3/26/01 10:25:29	3/28/01 12:43:05	22.29	.04
12	3/6/01 15:10:17	3/6/01 15:12:49	.04	19.62
13	3/9/01 8:06:22	3/9/01 8:07:44	.02	1.03
14	3/2/01 14:28:51	3/2/01 14:29:42	.01	41.77
15	3/15/01 11:10:30	3/15/01 11:12:20	.03	39.48
16	3/14/01 11:27:39	3/14/01 11:30:34	.05	9.82
17	3/23/01 16:28:45	3/23/01 16:30:07	.02	40.13
18	3/5/01 15:10:56	3/7/01 13:09:15	17.97	.02

Reject Interval - Partially Mechanized - Residential

1	3/14/01 15:04:38	3/14/01 16:06:30	.03	.67
2	3/20/01 17:25:56	3/20/01 17:28:03	.04	1.1
3	3/15/01 13:02:39	3/20/01 9:35:45	44.55	.01
4	3/30/01 13:47:57	3/30/01 15:42:35	1.91	.04
5	3/23/01 10:50:35	3/23/01 10:51:19	.01	.75
6	3/17/01 12:35:23	3/17/01 12:37:28	.03	12.3
7	3/2/01 10:15:21	3/2/01 10:17:39	.04	17.86
8	3/28/01 14:16:54	3/29/01 16:56:35	14.66	.01
9	3/19/01 15:55:09	3/19/01 15:57:10	.03	.64
10	3/13/01 23:38:39	3/14/01 10:51:54	3.87	.02



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	and the same seemble see to be until the same		a direction of the second second constant consta	
11	3/5/01 [F:55:47	3/7/01 14:03:10	26.12	.01
12	3/29/01 12:21:24	3/29/01 12:23:24	.03	3.91
13	3/6/01 12:53:56	3/6/01 12:56:41	.05	1.43
14	3/19/01 7:49:25	3/20/01 12:02:22	16.22	.05
15	3/16/01 16:40:20	3/16/01 16:41:31	.02	12.61
16	3/16/01 10:24:38	3/19/01 14:44:27	28.33	.03
17	3/2/01 20:14:19	3/5/01 17:01:27	22.02	.02
18	3/27/01 9:18:34	3/27/01 9:20:59	.04	62.35
19	3/27/01 18:15:56	3/31/01 8:59:33	38.73	.02
20	3/28/01 15:02:28	3/28/01 15:05:03	.04	.51
21	3/31/01 7:04:03	4/2/01 10:06:27	15.04	.03
22	3/27/01 12:37:47	3/28/01 14:15:35	13.63	.05
23	3/19/01 16:16:03	3/19/01 16:16:58	.02	9.22
24	3/20/01 13:38:53	3/20/01 13:39:38	.01	5.35
25	3/21/01 15:42:19	3/22/01 16:35:44	12.89	.04
26	3/7/01 9:35:39	3/12/01 7:24:06	45.81	.05
27	3/5/01 17:41:18	3/5/01 18:32:03	.85	.05
28	3/19/01 16:51:23	3/22/01 7:34:35	26.72	.04
29	3/3/01 14:32:19	3/6/01 12:31:09	21.98	.05
30	3/23/01 11:07:56	3/23/01 11:08:51	.02	33.42
31	3/27/01 9:15:24	3/27/01 9:17:36	.04	1.56
32	3/21/01 16:01:57	3/21/01 16:02:34	.01	41.78
33	3/14/01 11:37:36	3/15/01 15:09:24	15.53	.05
34	3/14/01 11:28:37	3/14/01 16:40:34	5.20	.03
35	3/19/01 12:14:28	3/19/01 12:15:44	.02	.12

Reject Interval - Non-Mechanized - Non-Residential*

1	122000 1129	3/23/01 12:27	670.97	650.97
2	12/6/00 14:53	3/17/01 14:04	723.12	703.12
3	7/23/99 14:14	3/20/01 8:55	4314.68	4214.69
4	1/13/00 11:42	3/3/01 8:36	2966.30	2906.3
5	11/2/00 15:06	3/27/01 12:59	1027.88	997.88
6	12/4/00 15:51	3/20/01 7:32	752.15	732.15

^{*} Given the time span of the transactions above, KPMG Consulting would like to request an updated list of BellSouth-designated holidays for this period.



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Impact:

CLECs rely on BellSouth's performance measurements to assess the quality of service provided by BellSouth and to plan future business activities. If BellSouth inappropriately calculates durations for the "Ordering: Reject Interval" and "Ordering: FOC Timeliness (Non-Trunks)" SQMs, KPMG Consulting cannot validate the accuracy of the SQM reports. Without accurate SQMs, CLECs are unable to assess the quality of service received or plan for future business activities reliably.



BellSouth Florida OSS Testing Evaluation

Date: March 22, 2001

EXCEPTION REPORT

KPMG Consulting has identified this exception as a result of the Billing Work Center/Help Desk. (PPR10)

Exception:

BellSouth's Billing Work Center lacks a formal process for identifying and planning for variations in the level of staff required to support work load for the Billing Work Center/Help Desk. (PPR10)

Issue:

During interviews with BellSouth Subject Matter Experts (SMEs) for PPR10: Billing Help Desk/Work Center Evaluation¹, KPMG Consulting noted the lack of a formal process to address work force capacity planning in the Billing Work Center.

BellSouth management relies on reports generated by the Billing Dispute Activity Tracking System (BDATS) to track the volume of disputes and uses the information to make staffing decisions. No formal documented capacity management process exists which encompasses total current and historical work volume, commitment intervals, production work time requirements, business conditions and market growth factors.

Impact:

Without adequate forecasting and capacity planning procedures, BellSouth's ability to respond to growth in CLEC inquiries and requests may be impaired. Such impairment can impact performance stability, including timeliness of response and resolution of claims.

¹ Interviews conducted with Managers at BellSouth Billing Work Center in Birmingham, AL, on 11/16/00.



BellSouth Florida OSS Testing Evaluation

Date: September 28, 2001

EXCEPTION REPORT

An exception has been identified with the ECTA Performance Evaluation (TVV8).

Exception:

BellSouth's Electronic Communications Trouble Administration (ECTA) system failed to process correctly following an outage and re-initialization. (TVV8)

Issue:

The connection between BellSouth and KPMG Consulting was lost for eleven minutes starting at approximately 8:10AM on 3/21/01. During this interval BellSouth rebooted their system due to an issue with another CLEC. Afterward the reboot, ECTA came back online and functioned with the following two deficiencies.

 KPMG Consulting sent transactions to create, and then cancel, trouble tickets for non-designed circuits. These cancel transactions did not execute within the target interval of three and one half minutes of BellSouth receiving the request ¹. The tickets identified in Table 1 remained in an active, pending test status as of 3/22/01.

Table 1: Open Trouble Tickets

LFL00104848	8:52AM	9:03AM	2:39PM	Active
LFL00104693	8:51AM	9:02AM	2:39PM	Active
LFL00206782	9:07AM	9:16AM	2:21PM	Active
LFL00207216	9:15AM	9:32AM	2:21PM	Active
LFL00106181	9:07AM	9:14AM	1:10PM	Active
LFL00209541	9:51AM	10:00AM	2:22PM	Active
LFL00445268	9:50AM	10:01AM	2:26PM	Active
LFL00206937	9:08AM	9:18AM	2:26PM	Active
LFL00105995	9:06AM	9:13AM	2:39PM	Active
LFL00345327	9:56AM	10:08AM	2:21PM	Active

2. Following the BellSouth ECTA system outage, the BellSouth ECTA system did not resynchronize with BellSouth's internal Maintenance and Repair (M&R)

¹ Joint Implementation Agreement for Electronic Communications Trouble Administration (ECTA) Gateway for Local Service between CKS and BellSouth, version 5/08/00, section 5.1, page 13 KPMG Consulting, Inc.



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OSS. This situation was identified during an investigation of several canceled trouble tickets which did not receive a corresponding close out verification via the KPMG Consulting ECTA system. KPMG Consulting performed a request ticket status transaction, and received a response confirming an open trouble ticket. Several calls to the Customer Wholesale Interconnect Network Service (CWIN) center confirmed that the cancel trouble tickets transactions had been processed by BellSouth's OSS, and that the tickets were closed. However, the BellSouth ECTA system did not return the close transaction verification, and failed to recognize the correct status of "closed" as per the information in the downstream OSS. Table 2 identifies those tickets where a discrepancy existed between the BellSouth ECTA system, and the systems in use by the CWIN center.

Table 2: CWIN Canceled Tickets Status

	03/21/2001		-	
LFL00209541	10:00AM	8504297462	Active	Closed at 10:05AM – 3/21
·	03/21/2001			
LFL00445268	10:01AM	9043556269	Active	Closed at 12:01PM - 3/21
	03/21/2001			
LFL00207216	9:32AM	8504341761	Active	Closed at 9:32AM – 3/21 Donna
	03/21/2001			
LFL00206937	9:18AM	8504390180	Active	Closed at 9:18AM – 3/21 Donna
	03/21/2001			
LFL00105995	9:13AM	9544672314	Active	Closed at 10:16AM - 3/21 Nancy
	03/21/2001			
LFL00104848	9:03AM	9545256983	Active	Closed at 9:06AM – 3/21 Nancy
	03/21/2001			
LFL00104693	9:02AM	9545240387	Active	Closed at 9:06AM - 3/21 Nancy

Amendment:

KPMG Consulting performed a re-test of BellSouth's Electronic Communication Trouble Administration system's ability to process trouble tickets prior to and following a system outage.

On September 19, 2001, KPMG Consulting attempted to enter trouble tickets via ECTA prior to and following a scheduled ECTA re-boot. KPMG Consulting attempted to create

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trouble tickets on Plain Old Telephone Service (POTS) lines before and after the scheduled re-boot.

Issue:

The ECTA system failed to process trouble tickets inserted on POTS lines before and after the scheduled server re-boot. Trouble tickets were successfully created on Design Circuits during the same time-frame. According to BellSouth, "the ECTA Application is rebooted every morning at 2:50am Eastern Time, this is the scheduled application re-boot. The system is generally back up and ready for use by 3:29am Eastern Time".²

The table below outlines a comprehensive list of 'enterTroubleReport' transactions attempted on both POTS and Design lines between 1:38AM and 4:08AM on the 19th of September, 2001:

3524909303	enterTroubleReport	9/19/2001 1:38	9/19/2001 1:38	105
50/LYFU/700026//SB	enterTroubleReport	9/19/2001 1:38	9/19/2001 1:38	
5615140311	enterTroubleReport	9/19/2001 1:41	9/19/2001 1:41	105
70/IBSD/586916/SB	enterTroubleReport	9/19/2001 1:43	9/19/2001 1:43	
48/LYFU/701228//SB	enterTroubleReport	9/19/2001 4:07	9/19/2001 4:07	
60/LYFU/776507//SB	enterTroubleReport	9/19/2001 4:07	9/19/2001 4:07	
56165 54 675	enterTroubleReport	9/19/2001 4:08	9/19/2001 4:08	105
56151 409 43	enterTroubleReport	9/19/2001 4:08	9/19/2001 4:08	105

The KPMG Consulting ECTA gateway was disassociated from the BellSouth ECTA Gateway at precisely 2:53AM and re-associated with the BellSouth ECTA Gateway at precisely 4:00AM. Four trouble tickets were successfully created on Design lines prior to 2:53AM and after 4:00AM. However, all four attempts at creating trouble tickets on POTS lines at similar times invoked error code 105- fallback reporting error.

Impact:

CLECs rely on the ECTA system to consistently and reliably process trouble tickets. If ECTA is unable to process trouble tickets on POTS lines for considerable periods of time prior to and following a server re-boot, CLECs ability to service their customers may be impacted.

² Information provided by BellSouth 08/13/01 via e-mail. KPMG Consulting, Inc. 09/28/01 Page 3 of 3



BellSouth Testing Evaluation

Date: April 04, 2001

EXCEPTION REPORT

KPMG Consulting has identified an exception as a result of the POP Functional Evaluation (TVV-1).

Exception:

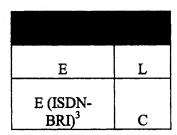
The Telecommunications Access Gateway (TAG) interface does not accurately implement the End User information requirements contained in The BellSouth Business Rules for Local Ordering -OSS '99, Issue 9L¹. (TVV1)

Background:

The Telecommunications Access Gateway (TAG) is an electronic, machine-to-machine interface that enables transfer of information between CLECs and BellSouth's Operational Support Systems (OSSs). In the process of providing Pre-Order and Order functionality for CLECs doing business with BellSouth, TAG implements BellSouth business rules in front-end edits to prevent non-compliant orders from reaching BellSouth's back-end systems.

Issue:

For the REQTYP/ACT combinations outlined in the table below, the BellSouth Business Rules for Local Ordering require that only the EU Name field be populated on the End User (EU) Form². However, when we submitted orders with only the EU Name field populated on the EU form, the orders were processed, and received an edit rejection message stating "STATE IS REQUIRED – ORDER NOT PROCESSED:"



¹ BellSouth Business Rules for Local Ordering – OSS99, *Issue 9L, March 30*, 2001. This document can be found at the following URL: http://www.interconnection.bellsouth.com/guides/html/leo.html

² See BellSouth Business Rules for Local Ordering – OSS99, *Issue 9L, March 30*, 2001, pages 193, 195, 196, 197, 439, 479, and 576.

³ REQTYP E (ISDN-BRI)/ACT C also requires EU-CITY. See BellSouth Business Rules for Local Ordering – OSS99, *Issue 9L, March 30*, 2001, pages 479.



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M	D
A	D
A	C

Contrary to the BellSouth Business Rules, the TAG front-end edits require that the address fields (SANO, SASD, SASN and SATH) be populated on the EU Form for service orders containing the above REQTYP/ACT combinations to be processed.⁴

Impact:

The lack of consistency between the Business Rules for ordering services from BellSouth and the TAG interface could impact CLECs in the following ways:

- Decrease in Customer Satisfaction. CLECs might experience delays if they are unable to submit orders due to conflicts between the Business Rules and the TAG front-end edits. A delay in delivering a service to a customer could negatively impact a customer's view of a CLEC's quality of service.
- Increase in Operating Costs. Ordering problems might require additional CLEC resources for order completion. Delays in problem resolution could increase the time expended by CLEC resources to successfully process individual customer orders.

⁴ See PON 016011FPTN102017, REQTYP E, ACT L, VER 00. KPMG Consulting, Inc. 04/04/01 Page 2 of 2



BellSouth Florida OSS Testing Evaluation

Date: April 4, 2001

EXCEPTION REPORT

An exception has been identified as a result of the test activities associated with the Functional Carrier Bill Evaluation (TVV11).

Exception:

BellSouth Resale bills fail to reflect usage charges for calls made by KPMG Consulting during the course of the Functional Usage Evaluation (TVV11).

Background:

Calls generated during the Functional Usage Evaluation resulted in Daily Usage File (DUF) records. Exchange Message Interface¹ (EMI) guidelines provide DUF record layout definitions by category, group and record type. Accordingly, for each call type a specific record is expected as shown below:

Call Type	Record
Collect	010131
Refund Request Toll	030101
Refund Request Local	030131
Directory Assistance (DA)	100132
Toli	010101
3 rd Party	010131

The usage associated with these records should appear on the BellSouth Resale bill.

Issue:

During the period between December 11-14, 2000, KPMG Consulting generated calls from six different locations on a variety of switch types. Upon review of the resale bills from BellSouth following test execution, KPMG Consulting noted that bills did not reflect all expected usage associated with collect calls, refund requests for toll calls, refund requests local calls, directory assistance calls, toll calls, and 3rd party calls.

Analysis Results Table 1.1:

COLOR	18	5	72%
Toll	40	6	85%
3 rd Party Billed	39	9	77%

¹ Exchange Message Interface (EMI); Industry Support Interface; Issue 17, Rev.1; April 2000



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Calif			
Local	322	25	92%
Refund Request Local	35	0	0%
Refund Request Toll	14	0	0%
Directory Assistance (DA)	100	0	0%

Representative examples of the calls missing are shown below.

Collect Calls Table 1.2:

12/12/2000	010131	4073702510	12:50:06	4079037291	4079037291
12/12/2000	010131	4073702510	11:56:02	4079037291	4079037291
12/12/2000	010131	9043556823	9:14:38	9043553129	9043553129
12/13/2000	010131	9043556823	9:25:48	9043556840	9043556840

Pofund Local Calls Table 1.3:

2000		A STATE OF THE STA	A control of the state of the s	to be determined to the second of the second	the state of the s	
						- mail
12/12/2000	030131	5615140613	13:39:40	5616896363	5615140613	0
12/12/2000	030131	5615140613	13:40:07	5616896363	5615140613	0
12/14/2000	030131	5618325672	14:49:42	5616553976	5618325672	0
12/11/2000	030131	9043556823	11:57:39	9042462030	9043556823	0
12/14/2000	030131	9043556823	11:44:30	9049404123	9043556823	0

Refund Toll Calls Table 1.4:

12/12/2000	No.	8304375768	11:33:10	8504375768	8502432135	Ō
12/12/2000	030101	8504375768	11:33:10	8504375768	8502432135	1
12/13/2000	030101	8504375768	13:21:59	8504375768	8506823201	1
12/14/2000	030101	8504375768	14:14:23	8504375768	8506823201	1

DA Calls Table 1.5:

12/11/2000	010132	5615140599	15:18:16	5614110000	5615140599	1	
12/11/2000	010132	5615140599	16:44:02	5614110000	5615140599	1	
12/11/2000	010132	5615140599	16:47:13	5614110000	5615140599	1	
12/11/2000	010132	5615140599	16:50:13	5614110000	5615140599	1	
12/12/2000	010132	5615140613	11:45:57	5614110000	5615140613	1	
12/12/2000	010132	5615140613	11:52:17	5615551212	5615140613	1	



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Section .								
	12/12/2000	010132	5615140613	11:53:51	5615551212	5615140613	1	
	12/12/2000	010132	5615140613	11:59:37	5614110000	5615140613	1	

Toll Calls Table 1.6:

mental has a first of the control of	a la primary designation				and the state of t		
Water and	(200 /: .)	5710-51	8.48352436	Service States			
	010101	8504375768	8506823201	8504375768	11:35:03		
12/14/2000	010101	3056858869	5616550272	3056858869	13:04:16		
12/14/2000	010101	3056858869	5616550272	3056858869	13:14:13		

3rd Party Calle Table 1.7:

12/12/2000	010131	4073702510	4076446000	4072260966	11:49:35
12/11/2000	010131	4073702510	4073232272	4073450312	12:27:28
12/12/2000	010131	4073702510	4076280035	4079037291	12:31:53
12/12/2000	010131	4073702510	4073232272	4079037291	12:57:29
12/12/2000	010131	4073702510	4079311165	4079037291	13:17:58
12/12/2000	010131	8504291707	8504370626	8504375768	12:29:13

Impact:

A CLEC's ability to accurately project revenue and operating expenses is based, in part, on accurate billings from the ILEC. Incorrect billing can distort financial planning. In addition, incorrect charges on CLEC bills may cause a CLEC to incur added costs for bill reconciliation and pursuit of bill corrections.